



Arent Fox LLP / Attorneys at Law  
Boston / Los Angeles / New York / San Francisco / Washington, DC

September 16, 2021

**VIA ECF**

The Honorable Diane Gujarati  
United States District Judge  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Glenn Colton**

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Re: United States v. Schneider, et al., 21-CR-54 (DG) (E.D.N.Y.)

Dear Judge Gujarati:

We represent Jeffry Schneider in the above-captioned case. We write respectfully to request that the court modify the conditions of Mr. Schneider's pretrial release to remove the requirement that Mr. Schneider submit to random drug testing.

Mr. Schneider was arrested on February 4, 2021 in Austin, Texas and later released on bond by Magistrate Judge Lane of the United States District Court for the Western District of Texas. *See* Order Setting Conditions of Release (W.D. Tex. Feb. 5, 2021), ECF No. 6. As part of the conditions of his release, Mr. Schneider was required to submit to drug testing as required by the Pretrial Services officer, who at the time was Officer Linda Cano. *Id.* This Court, at the arraignment in Magistrate's Court, likewise required Mr. Schneider to undergo testing for substance abuse as directed by Pretrial Services. *See* Order Setting Conditions of Release and Appearance Bond, (E.D.N.Y. Feb. 12, 2021), ECF Nos. 24 and 43. Since Mr. Schneider's arrest over seven months ago, Mr. Schneider has called into Pretrial Services nightly and passed all of the approximately six drug tests that have been administered.

Mr. Schneider's current Pretrial Services Officer, Matthew Gosser, has advised us that he supports this request. The AUSAs assigned to this case, in turn, have advised us that the Government defers to Pretrial Services on this matter. Therefore, we respectfully request that Your Honor so-order this letter requesting, without objection, that Mr. Schneider no longer need to submit to random drug testing as a condition of his pretrial release.

**Arent Fox**

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Respectfully submitted,

*/s/ Glenn Colton*

Glenn Colton

cc: Matthew Gosser, Pretrial Services Officer, [matthew\\_gosser@txwpt.uscourts.gov](mailto:matthew_gosser@txwpt.uscourts.gov)  
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